

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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DEUTSCHE BANK TRUST COMPANY,
AMERICAS, in its capacity as successor indenture
trustee for certain series of Senior Notes, LAW
DEBENTURE TRUST COMPANY OF NEW
YORK, in its capacity as successor indenture
trustee for certain series of Senior Notes, and
WILMINGTON TRUST COMPANY, in its
capacity as successor indenture trustee for certain
series of PHONES Notes

Plaintiffs,

vs.

ADALY OPPORTUNITY FUND TD
SECURITIES INC. C/O ADALY INVESTMENT
MANAGEMENT CO., *et al.*

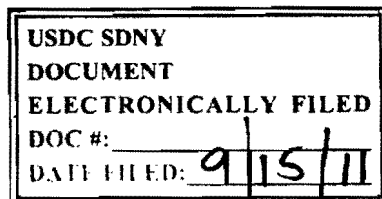
Defendants.
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Docket No. 11-cv-04784 (RJH)

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned that:

1. Defendants Nomura Securities International, Inc. and Nomura Securities International, Inc. - Stock Lending shall have up to and including October 20, 2011, to respond to the amended complaint, subject to any stay of proceedings which may then be in effect;
2. Said defendants waive any defenses relating to service of process; and
3. Electronically transmitted or facsimile signatures on this stipulation shall be deemed as originals for all purposes.



Dated: September 8, 2011

AKIN GUMP STRAUSS HAUER & FELD
LLP

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International, Inc. - Stock Lending*


U.S.B.J.
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